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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STATUS REPORT REGARDING
SECURITIES CLAIMS RESOLUTION**

[Related to Docket No. 14593]

[No hearing required]

1 In accordance with the Court's September 18, 2024 *Memorandum Decision On Thirty-Third And*
2 *Thirty-Fourth Securities Omnibus Claims Objections* [Dkt. No. 14593], PG&E Corporation and Pacific
3 Gas and Electric Company, as debtors and reorganized debtors (collectively, "**PG&E**," the "**Debtors**,"
4 or the "**Reorganized Debtors**") in the above-captioned chapter 11 cases (the "**Chapter 11 Cases**"),
5 hereby submit this Status Report regarding their considerable progress in resolving securities claims.

6 The Reorganized Debtors' June 21, 2024 *Status Report Regarding Securities Claims Resolution*
7 *And In Response To May 30, 2024 Memorandum* [Dkt. No. 14500] (the "**June 21 Status Report**")
8 demonstrated that the Securities ADR Procedures adopted by the Court have worked exceedingly well
9 to resolve the securities claims. The Reorganized Debtors reported that more than 93% of the securities
10 claims had been resolved and that all of the largest potential claims not represented by Rolnick Kramer
11 Sadighi LLP ("**RKS**" and the "**RKS Claimants**") had been resolved.¹ Since the June 21 Status Report
12 was filed, the Reorganized Debtors have continued to settle claims:

- 13 • There are now only 586 unresolved securities claims (8,976 total claims
14 less 8,390 resolved claims).
- 15 • Of the 586 unresolved securities claims, 479 are claims brought by RKS
16 Claimants.
- 17 • There are now **only 107 unresolved non-RKS securities claims**.

18 The most important metric, however, is the number of unique claimants or groups of claimants that have
19 filed proofs of claim whose claims remain unresolved. Thus, while there are 107 unresolved non-RKS
20 proofs of claim, there are now **only 27 unique non-RKS Claimants or claimant groups remaining**.²

21 Additionally, 15 of these 27 claimant groups are represented by three law firms: five claimants
22 are the PERA plaintiffs themselves; five claimants are represented by Bernstein Litowitz Berger &
23 Grossman LLP; and five claimants are represented by BLA Schwartz PC. **Outside of these 3 groupings**
24 **of claimants, there are only 12 unique non-RKS Claimants whose claims remain unresolved**. As

25 ¹ This Status Report treats settlements as resolved claims where agreements have been reached, but the
26 settlement documents have not yet been executed.

27 ² One of these 27 claimant groups is responsible for more than half of those 107 unresolved claims,
28 having filed 57 proofs of claim.

1 discussed in the June 21 Status Report, the Reorganized Debtors continue to engage in settlement
2 discussions (both in and outside of mediation) to resolve the few remaining non-RKS claims.

3 The Reorganized Debtors have also continued to make progress in resolving the claims of the
4 RKS Claimants. There are now only 59 RKS Claimants or groups of affiliated claimants who have 479
5 unresolved RKS proofs of claims. The Reorganized Debtors and RKS also continue to have discussions
6 to resolve securities claims. The resolution of those claims will be coordinated through and with RKS.

7 The 27 remaining unresolved non-RKS Claimants, as noted above, fall into 4 buckets.

- 8 • The claims of the five (5) PERA claimants.³
- 9 • The claims of the five (5) claimants represented by Bernstein Litowitz.
- 10 • The claims of the five (5) claimants represented by BLA Schwartz.
- 11 • Negotiations to resolve claims are ongoing with many of the remaining
12 twelve (12) non-RKS claimants with unresolved claims. Of these 12
13 claimants, only six (6) have sought to adopt the PERA complaint, and only
14 two (2) of those 12 claimants sought to adopt the PERA complaint in a
15 timely fashion, according to this Court's schedule.

16 In short, there are very few remaining claimants and almost all are grouped such that the
17 remaining claims can be easily coordinated and litigated, if necessary. We note that in *PERA's Response*
18 *To The Court's Memorandum of May 30, 2024* [Dkt. No. 14497], it asserted that "107 claims have opted
19 to align themselves with PERA." *Id.* at 1. Putting aside that PERA's intentionally chosen language
20 attempts to obscure that PERA's counsel does not represent and has never represented the claimants that
21 hold these claims, almost all of those 107 claims have been settled directly with the claimants. Of the
22 "21 claims identified on Exhibit A to the Stipulation Regarding Motion of Lead Plaintiff Pursuant to
23 B.L.R. 9006-1 to Extend Time to File Response to Certain Claim Objections" (*id.*), the Reorganized
24 Debtors have resolved 17. Similarly, of the "82 claims [] listed in Exhibit A ('Claims to Be Disallowed
25 and Expunged') to Reorganized Debtors' Thirty-Third Securities Omnibus Claims Objection to PERA

26 ³ The District Court referred the District Court action brought by PERA against the Debtors' former
27 D&Os and underwriters to a mediator, Judge Margaret Morrow. A mediation session was held and the
28 mediation process is continuing.

1 and Securities Act Plaintiffs' TAC" (*id.*), the Reorganized Debtors have resolved 53. Thus, of the 27
2 non-RKS claimants who have unresolved claims, only sixteen (16) have adopted or sought to adopt the
3 PERA complaint – and 5 of those are the PERA claimants themselves.

4 As discussed in the June 21 Status Report, the Reorganized Debtors intend to file additional claim
5 objections, but only if the Reorganized Debtors are unable to resolve the claims of the small handful of
6 claimants who are not already subject to an omnibus objection, the exact number of which will depend
7 on the success of ongoing mediations and settlement negotiations.

8 As also discussed in the June 21 Status Report, it is obvious and evident based on the small
9 handful of claimants with unresolved claims remaining that a class should not and could not be certified
10 here. The Securities ADR Procedures have proven to be an effective tool to resolve claims and the small
11 number of claimants whose claims remain outstanding are largely grouped and represented by counsel.
12 There are now fewer than 10 claimants with unresolved claims who are not represented by counsel.

13 Dated: October 15, 2024

14 **WEIL, GOTSHAL & MANGES LLP**
15 **KELLER BENVENUTTI KIM LLP**

16 By: /s/ Richard W. Slack
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